



MICHAEL P. LOWRY, ESQ.
Nevada Bar No. 10666
E-mail: Michael.Lowry@wilsonelser.com
ROBERT L. THOMPSON, ESQ.
Nevada Bar No. 9920
E-mail: Robert.Thompson@wilsonelser.com
6689 Las Vegas Blvd. South, Suite 200
Las Vegas, Nevada 89119
Tel: 702.727.1400/Fax: 702.727.1401
Attorneys for Geonnie Allums; C.R. England, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LAURA MORENO,

Plaintiff,

vs.

GEONNIE ALLUMS, individually; C.R.
ENGLAND, INC.; ENGLAND LOGISTICS, INC;
and DOES 1 to 100, ROE CORPORATIONS 1 to
100, inclusive

Defendants.

Case No.: 2:19-cv-372 -JCM-DJA

**STIPULATION AND ORDER TO
EXTEND DISCOVERY (FIFTH
REQUEST)**

Plaintiff LAURA MORENO, by and through her attorneys of record, FARHAN R. NAQVI and ELIZABETH E. COATS of NAQVI INJURY LAW, Defendants GEONNIE ALLUMS and C.R. ENGLAND, INC., by and through their counsel of record, MICHAEL P. LOWRY, ESQ. of WILSON ELSE MOSKOWITZ EDELMAN & DICKER LLP, submit this **STIPULATION AND ORDER TO EXTEND DISCOVERY (FIFTH REQUEST)** pursuant Rules 6(b) and 26(f) of the Federal Rules of Civil Procedure and Local Rules 6-1 and ²⁶⁻³~~26-4~~ for the Court's consideration:

I.

DISCOVERY COMPLETED TO DATE

1. A 26(f) Conference was held and a Discovery Plan and Scheduling Order was filed.
2. Plaintiff made initial disclosures pursuant to FRCP 26(a) wherein medical records,

1 bills, and other documents and items have been disclosed.

2 3. Plaintiff served first supplemental disclosures.

3 4. Plaintiff served second supplemental disclosures.

4 5. Plaintiff served third supplemental disclosures.

5 6. Defendants made initial disclosures pursuant to FRCP 26(a).

6 7. Defendants served first supplemental disclosures.

7 8. Defendants served second supplemental disclosures.

8 9. Defendants served third supplemental disclosures.

9 10. Defendants served fourth supplemental disclosures.

10 11. Defendants served fifth supplemental disclosures.

11 12. Plaintiff propounded a first set of requests for production upon Defendant Geonnie
12 Allums (responses pending).

13 13. Plaintiff propounded a first set of interrogatories upon Defendant Geonnie Allums
14 (responses pending).

15 14. Plaintiff propounded a first set of requests for production upon Defendant C.R.
16 England, Inc., to which responses have been provided.

17 15. Defendant C.R. England, Inc. has responded to Plaintiff's first set of requests for
18 production.

19 16. Plaintiff propounded a first set of interrogatories upon Defendant C.R. England, Inc.

20 17. Defendant C.R. England, Inc. has responded to Plaintiff's first set of interrogatories.

21 18. Defendant C.R. England, Inc. served a first set of requests for production to Plaintiff,
22 to which responses have been provided.

23 19. Plaintiff made initial disclosures pursuant to FRCP 26(a) wherein medical records,
24 bills, and other documents and items have been disclosed.

25 20. Plaintiff served first supplemental disclosures.

26 21. Plaintiff served second supplemental disclosures.

27 22. Plaintiff has responded to Defendant C.R. England, Inc.'s second set of requests for
28 production.

1 23. Plaintiff propounded a first set of request for admissions to Defendant Geonnie
2 Allums.

3 24. Plaintiff propounded a first set of request for admissions to Defendant C.R. England,
4 Inc.

5 25. Defendants have served subpoena duces tecum to Nevada Highway Patrol and Trans
6 Vegas Express c/o National Registered Agents.

7 26. Plaintiff have served subpoena duces tecum to various facilities.

8 27. The deposition of Plaintiff has been taken.

9 28. The deposition of Defendant Geonnie Allums was noticed and proceeded forward, but
10 a non-appearance was taken as he did not attend.

11 29. Plaintiff has disclosed over 3,000 pages of records thus far, most of which are medical
12 records.

13 30. Plaintiff has disclosed 22 medical facilities to which she has presented for her
14 collision-related injuries.

15 31. Plaintiff has disclosed her initial experts and their reports.

16 32. Defendants have disclosed its initial experts and their reports.

17 33. Plaintiff has disclosed her rebuttal experts and their reports.

18 34. Defendants have disclosed its rebuttal experts and their reports.

19 II

20 **DISCOVERY TO BE COMPLETED**

21 1. Depositions of various witnesses including but not limited to:

22 a. The 30(b)(6) designee(s) for Defendant;

23 b. Plaintiff's treating physicians;

24 c. Experts;

25 d. Other witnesses
26
27
28

III.

**WHY DISCOVERY CANNOT BE COMPLETED IN THE TIME PROVIDED BY THE
SCHEDULING ORDER**

Good cause exists in this case to grant a discovery extension. Plaintiff's and Defendants' counsel had been working together to schedule the deposition of Defendant C.R. England's 30(b)(6), said deposition had to be postponed due to the COVID-19 outbreak. We have tentatively scheduled the deposition for September 29, 2020. Further, the parties are in the process of scheduling at least five of Plaintiff's experts for deposition and are coordinating dates for each expert and counsel.

Furthermore, the parties are exploring the possibility of participating in a mediation prior to expending additional resources on this matter. In the interest of allowing the parties to attempt resolution before expending additional resources in this matter, the parties respectfully request that the discovery deadlines be extended as outlined below. This extension will help to facilitate the parties' attempt at resolving this matter by preserving the unnecessary expenditure of costs and resources. Therefore, to allow sufficient time for the foregoing, the parties respectfully request a continuance of the discovery deadlines in this matter as outlined in the chart below.

IV.

PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY

| DISCOVERY | PROPOSED DEADLINE |
|------------------------------|--------------------------|
| Motion to Amend Pleadings: | Completed |
| Initial Expert Disclosures | Completed |
| Rebuttal Expert Disclosures: | Completed |
| Interim Status Report | Completed |
| Close of Discovery | December 23, 2020 |
| Dispositive Motions: | January 25, 2021 |
| Joint Pre-Trial Order: | February 25, 2021 |

DATED this 16th day of September, 2020.

NAQVI INJURY LAW



BY: /s/ Elizabeth E. Coats
FARHAN R. NAQVI, ESQ
Nevada Bar No. 8589
ELIZABETH E. COATS
Nevada Bar No. 12350
9500 W. Flamingo Rd., Suite 104
Las Vegas, Nevada 89147
Counsel for Plaintiff

BY: /s/ Michael P. Lowry
MICHAEL P. LOWRY, ESQ.
Nevada Bar No. 10666
ROBERT L. THOMPSON, ESQ.
6689 Las Vegas Blvd. South, Suite 200
Las Vegas, Nevada 89119
Las Vegas, NV 89101-6014
Attorneys for Geonnie Allums; C.R.
England, Inc.

IT IS SO ORDERED

Dated this 18th day of September, 2020

A handwritten signature in blue ink, appearing to read 'Daniel J. Albregts', written over a horizontal line.

Daniel J. Albregts
United States Magistrate Judge